

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Bridgestone Firestone North American Tire, LLC
Attn: Brad Taylor, Plant Engineer
1600 Fort Jesse Road
Normal, Illinois 61761

I.D. No.: ID# 113823AAB
Application No.: 95120125

Date Received: October 19, 2005
Date Issued: November 9, 2006
Expiration Date: November 8, 2011

Operation of: Rubber Tires Manufacturing Plant
Source Location: 1600 Fort Jesse Road, Normal, McLean County, 61761
Responsible Official: Kirk Vermie, General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a rubber tires manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

¹ Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Bridgestone Firestone North American Tire, LLC
1600 Fort Jesse Road
Normal, Illinois 61761
309/451-2317

I.D. No.: 113823AAB
County: McLean
Standard Industrial Classification: 3011, Rubber Products

1.2 Owner/Parent Company

Bridgestone Americas Holding, Inc.
535 Marriott Drive
Nashville, Tennessee 37214

1.3 Operator

Bridgestone Firestone North American Tire, LLC
1600 Fort Jesse Road
Normal, Illinois 61761

Brad Taylor
309/451-2317

1.4 Source Description

Bridgestone Firestone North American Tire, LLC is located at Veterans Parkway and Fort Jesse Road in Normal and manufacturers off-road rubber tires. The source operates the following significant emission units at this site: rubber mills, calender stations, green tire assembly and spray booth stations, curing presses, solvent storage tank, and fuel combustion emission units.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Finish Department tire inspection stations; and
Small rubber warm-up mills

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].
- c. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].
- d. Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.4 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date of Construction	Emission Control Equipment	Section of the CAAPP permit
Rubber Mills	Nine Rubber Mills	1965-1967	None	7.1
Calender Stations	Three calender stations	1965-1967	None	7.2
Green Tire Assembly Stations	30 Assembly Stations	1965-1998	None	7.3
Green Tire Doping & Finishing Spray Booths	Two doping spray booths (Green Tires Department)		Filters	7.4
	One finish spray booth (Finish Department)	1968	Filter	
Curing Presses	39 tire curing presses and pot heaters	1965-1975	None	7.5
Solvent Storage Tank	10,000 gallons storage tank	1988	None	7.6
Fuel Combustion Emission Units	<p>Natural Gas-Fired Steam Boilers</p> <p>Two boilers are rated at 32.2 mmBtu/hr each and one is rated 35.0 mmBtu/hr</p> <p>Natural Gas-Fired Heaters</p> <p>Heaters are rated at 2.5 mmBtu/hr each (9 units) and 11.0 mmBtu/hr (1 unit)</p>	<p>N/A</p> <p>1965</p>	<p>None</p> <p>None</p>	7.7

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Area Designation

5.2.1 This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO₂, ozone, PM_{2.5}, PM₁₀, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.4 Source-Wide Non-Applicability of Regulations of Concern

- a. This source is not subject to 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products". This regulation applies for tires with a bead diameter of less than 20.0 inches, as defined in 35 IAC 211.4790. This non-applicability is based on the size of tires (from about 36 inches and more in diameter) manufactured at this location.
- b. This source is not subject to 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry". This regulation applies for tires with a bead diameter of less than 19.7 inches. This non-applicability is based on the size of tires (from about 36 inches and more in diameter) manufactured at this location.
- c. This source is not subject to 40 CFR Part 63, Subpart XXXX "Rubber Tire Manufacturing", because the source is not a major source of HAP emissions. (See also Condition 5.6.2)
- d. The source shall be subject to any regulation mentioned above, if it either decides to manufacture different tires of sizes subject to those standards or becomes a major source of HAP emissions. The Permittee then should apply for a revision of this permit and certify compliance with those rules.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be

determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	576.40
Sulfur Dioxide (SO ₂)	0.40
Particulate Matter (PM)	12.50
Nitrogen Oxides (NO _x)	76.50
HAP, not included in VOM or PM	----
Total	665.80

5.6.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions and the requirements of 40 CFR Part 63, Subpart XXXX "Rubber Tire Manufacturing" do not apply to the source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2, and 5.10.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. **Testing by Owner or Operator:** The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a

person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.
- b. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Recordkeeping requirement for applicability determination

For non-major HAP (area) sources under 40 CFR Part 63, the Permittee should follow the requirements established by 40 CFR 63.10(b)(3) to support exempt status from 40 CFR Part 63 Subpart XXXX:

If an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112 (d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of this part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112, if any. The requirements to determine applicability of a standard under 63.1(b)(3) and to record the results of that determination under paragraph (b)(3) of this section shall not by themselves create an obligation for the owner or operator to obtain a title V permit [40 CFR 63.10(b)(3)].

5.9.3 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for

the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.
- c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.

5.9.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Rubber Mills

7.1.1 Description

The purchased rubber is first milled, which is the process of working and blending the various rubber compounds between sets of metal rollers. Milling not only blends the rubber compounds but raises its temperature. Raising the temperature of the rubber makes it more pliable and able to withstand the mechanical stresses imposed by the manufacturing operations carried out at the facility. There are nine primary mills at this location. The rubber is passed from mill to mill to process and prepare the various compounds. Once the rubber is properly blended and prepared, overhead conveyors transfer it from the mills to the various manufacturing operations.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Rubber Mills	Nine Rubber Mills	1965-1967	None

7.1.3 Applicable Provisions and Regulations

- a. An "affected rubber mill" for the purpose of these unit specific conditions is an emission unit which blends the various rubber compounds between sets of metal rollers prior to further transfer to various manufacturing operations.
- b. Each affected rubber mill is subject to 35 IAC 212.322(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

- d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.1.4 Non-Applicability of Regulations of Concern

The affected rubber mill is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected rubber mill does not use an add-on control device to achieve compliance with the emission limitations or standards.

7.1.5 Control Requirements and Work Practices

The Permittee should operate the affected rubber mills in accordance with a manufacturer's manual, procedures and recommendations, or in accordance with the operational manuals/procedures established by the source. The Permittee should fulfill all steps prescribed there for the purposes of the monitoring of operating parameters and minimizing emissions released into the atmosphere. These written manuals/procedures should be kept at the source and be a part of the records established by this permit. This condition is established pursuant to 39.5(7) of the Act.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected rubber mills.

7.1.7 Testing Requirements

Testing requirements are not set for the affected rubber mills.

7.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected rubber mills.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected rubber mills to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total rubber throughput on the monthly and annual basis (T/mo and T/yr).
- b. Average hourly production rate (rubber throughput) for each individual rubber mill (lb/hr) calculated each month.

- c. Average hourly VOM emissions for each individual rubber mill calculated each month based on the procedures established in Condition 7.1.12.
- d. Total emissions of VOM calculated based on the procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected rubber mills with the permit requirements, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM from the affected rubber mills in excess of the limits specified in Condition 7.1.3(c) within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected rubber mills.

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(c) is addressed by the records required in Condition 7.1.9) and the emission factors and formulas listed below.
- b. Compliance with the opacity emission limits established by Condition 7.1.3(e) should be achieved by the proper operation, as required by Condition 7.1.5.
- c. Compliance with the PM emission limits established by Condition 7.1.3(b) should be achieved by the proper operation, as required by Condition 7.1.5.
- d.
 - i. To determine compliance with Condition 5.6.1, VOM emissions from the affected rubber mills shall be calculated based on the emission factor equal to 0.000314 lb/VOM for each lb of rubber processed. This emission factor has been established in Table 4.12-5 of AP-42 and developed by the Rubber Manufacturing Association for rubber milling operations.
 - ii. To determine compliance with Condition 7.1.3(c), average hourly VOM emissions from each individual rubber mill shall be calculated by using the following equation and emission factor 0.000314 mentioned above:

Hourly Emissions = Average hourly production rate
(lb) x 0.000314

- e. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 Calender Stations

7.2.1 Description

Calendering is the blending and shaping of rubber by pressing it between rotating metal cylinders. The calendars form the rubber into thin sheets of material. Fabrics or steel can be inserted between layers of calendered rubber to add strength to the product.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Calender Stations	Three calender stations	1965-1967	None

7.2.3 Applicable Provisions and Regulations

- a. An "affected calender station" for the purpose of these unit specific conditions is the unit described in Conditions 7.2.1 and 7.2.2 above.
- b. Each affected calender station is subject to 35 IAC 212.322(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].
- d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.2.4 Non-Applicability of Regulations of Concern

The affected calender stations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these units do not use an add-on control device

to achieve compliance with the emission limitations or standards.

7.2.5 Control Requirements and Work Practices

The Permittee should operate the affected calender stations in accordance with a manufacturer's manual, procedures and recommendations, or in accordance with the operational manuals/procedures established by the source. The Permittee should fulfill all steps prescribed there for the purposes of the monitoring of operating parameters and minimizing emissions released into the atmosphere. These written manuals/procedures should be kept at the source and be a part of the records established by this permit. This condition is established pursuant to 39.5(7) of the Act.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected calender stations.

7.2.7 Testing Requirements

Testing requirements are not set for the affected calender stations.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected calender stations.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected calender stations to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total rubber throughput on the monthly and annual basis (T/mo and T/yr).
- b. Average hourly production rate (rubber throughput) for each individual calender station (lb/hr) calculated each month.
- c. Average hourly VOM emissions for each individual calender station calculated each month based on the procedures established in Condition 7.2.12.
- d. Total emissions of VOM calculated based on the procedures established in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected calendar stations with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM from the affected calendar stations in excess of the limits specified in Condition 7.2.3(c) within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected calendar stations.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(c) is addressed by the records required in Condition 7.2.9) and the emission factors and formulas listed below.
- b. Compliance with the opacity emission limits established by Condition 7.2.3(e) should be achieved by the proper operation, as required by Condition 7.2.5.
- c. Compliance with the PM emission limits established by Condition 7.2.3(b) should be achieved by the proper operation, as required by Condition 7.2.5.
- d.
 - i. To determine compliance with Condition 5.6.1, VOM emissions from the affected calendar stations shall be calculated based on the emission factor equal to 0.000186 lb/VOM for each lb of rubber processed. This emission factor has been established in Table 4.12-7 of AP-42 and developed by the Rubber Manufacturing Association for rubber calendaring operations.
 - ii. To determine compliance with Condition 7.2.3(c), average hourly VOM emissions from each individual calendar station shall be calculated by using the following equation and emission factor 0.000186 mentioned above:

$$\text{Hourly Emissions} = \text{Average hourly production rate (lb)} \times 0.000186$$

- e. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.3 Green Tire Assembly Stations

7.3.1 Description

All green tire assembly stations are grouped into the following categories: band-building, carcass building, and treading.

The inner liner is first wrapped around a metal cylinder the size of which is dependent upon the required bead diameter. After this, calendared belt material is wrapped around the inner bladder. The number of belts varies depending upon the required strength of the finished product. The beads are then inserted and the sidewalls are added. The final step is the addition of the tread material. Solvents are applied to the tire assemblies as needed to help the various rubber components adhere to one another.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Green Tire Assembly Stations	30 Assembly Stations	1965-1998	None

7.3.3 Applicable Provisions and Regulations

- a. An "affected assembly station" for the purpose of these unit specific conditions is the unit described in Conditions 7.3.1 and 7.3.2 above.
- b. Each affected assembly station (constructed after April 14, 1972) is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. Each affected assembly station (constructed prior to April 14, 1972) is subject to 35 IAC 212.322(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of

particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].
- e. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected assembly stations are not subject to 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products" and 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry" pursuant to Condition 5.4.
- b. The affected assembly stations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements and Work Practices

The Permittee should operate the affected assembly stations in accordance with a manufacturer's manual, procedures and recommendations, or in accordance with the operational manuals/procedures established by the source. The Permittee should fulfill all steps prescribed there for the purposes of the monitoring of operating parameters and minimizing emissions released into the atmosphere. These written manuals/procedures should be kept at the source and be a part of the records established by this permit. This condition is established pursuant to 39.5(7) of the Act.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected assembly stations are subject to the following:

Emissions from the affected assembly stations shall not exceed the following limits:

Designation	Permit	VOM Emissions	
		(T/Mo)	(T/Yr)
4 Stations (H-1 TAM, H-2 TAM, A3A OLT North, A3A OLT South)	94100027	3.12	25.00
2 Stations (ORB, SR-1)	95020123	3.12	25.00
1 Station (G-1 (ORB-57))	96060051	3.50	15.33
1 Station (H-3 TAM (46 TAM))	97010083	0.55	4.38
1 Station (ORB-25)	99010021	1.31	13.10
3 Stations (F-3 TAM, ORB-35, SR-2)	99100091	4.43	35.46

- a. The above limitations are based on emissions of 100% of VOM contained in solvent used.
- b. The above limitations were established in the Permits mentioned above, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction addressed in the aforementioned permits do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].
- c. Compliance with emissions limits shall be determined from records of solvent usage and VOM content from records of all tire assembly machines combined with emissions from the affected assembly stations calculated based upon the fraction of production (on the basis of pounds of material processed) handled by the affected assembly stations, as shown in Condition 7.3.12. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.3.7 Testing Requirements

The Permittee should maintain annual certification on the VOM content (lb/gal or wt.%) for each solvent applied on the affected assembly stations. Such certification may be obtained by either testing of the solvents or by keeping the records of the manufacturer's specification sheets for each such solvent.

7.3.8 Monitoring Requirements

Specific monitoring requirements are not set for the affected assembly stations.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected assembly stations to demonstrate compliance with

Conditions 5.6 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly and annual usage of each VOM containing solvent and cement for all affected assembly stations combined (gal/mo and gal/yr).
- b. VOM content of each solvent applied (lb/gal or wt.%).
- c. Monthly and annual amount (lb/mo and lb/yr) of material processed at all assembly stations combined.
- d. Calculated monthly and annual amount (lb/mo and lb/yr) of material processed at each affected assembly station.
- e. Hours of operations per month for each affected assembly station.
- f. Monthly and annual emissions of VOM for the affected assembly stations identified in Condition 7.3.6(a) calculated based on the Compliance Procedures established in Condition 7.3.12.
- g. Total monthly and annual emissions of VOM for all affected assembly stations calculated based on the Compliance Procedures established in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected assembly stations with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM from the affected assembly stations in excess of the limits specified in Conditions 7.3.3 and 7.3.6 within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected assembly stations.

7.3.12 Compliance Procedures

- a. Compliance with the opacity emission limits established by Condition 7.3.3(f) should be achieved by the proper operation, as required by Condition 7.3.5.
- b. Compliance with the PM emission limits established by Condition 7.3.3(b) and (c) should be achieved by the proper operation, as required by Condition 7.3.5.

- c. i. Compliance with emissions limits in Condition 7.3.6(a) shall be based on the recordkeeping requirements in Condition 7.3.9 and an assumption that 100% of VOM from VOM containing materials is emitted. VOM emissions for each affected assembly station shall be calculated based on the formula listed below:

$$Evom_i = V \times f_i$$

Where:

$Evom_i$: VOM emission rate for each affected assembly station (tons)

V : VOM usage for all tire assembly machines combined (tons)

f_i : Fraction of material processed at the affected assembly station calculated by dividing the amount of material processed at the affected assembly station by the amount of material processed at all assembly stations combined

- ii. Compliance with hourly VOM emission limit identified in Condition 7.3.3(d) for each affected assembly station should be demonstrated by dividing monthly VOM emissions by actual hours any particular station was in operation in any given month.
- d. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.4 Green Tire Doping & Finishing Spray Booths

7.4.1 Description

Green tires from the assembly stations are transferred to the green tire storage area or to the green tire doping operations. In the doping operations the insides of the green tires are sprayed with a lubricating solution. This lubricating solution is a water based compound that keeps the tires from sticking to the bladders used to inflate them for curing. The outsides of the green tires are sprayed with a water based blemish paint that covers blemishes and areas of discoloration on the surfaces of the tires.

In the finishing department the repaired tires that pass the visual inspection process have the repaired areas ground and buffed to smooth the repair and make it blend in with the rest of the tire. These tires are then sprayed with a blemish paint and sent to the warehouse. This coating process covers any remaining areas of discoloration and provides uniform coloring to the facility's products. The solvents used in this booth consist of waste solvent collected from the individual manufacturing stations.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Green Tire Doping & Finishing Spray Booths	Two doping spray booths (Green Tires Department)	1968	Filters
	One finish spray booth (Finish Department)		Filter

7.4.3 Applicable Provisions and Regulations

- a. An "affected spray booth" for the purpose of these unit specific conditions is a unit as described in Conditions 7.4.1 and 7.4.2 above.
- b. Each affected spray booth (other than finish spray booth) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates

specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. The affected finish spray booth is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].
- e. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected coating booths are not subject to 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products" and 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry" pursuant to Condition 5.4.
- b. This permit is issued based on the affected coating booth operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) plan for VOM and PM/PM₁₀, because of the following:
 - i. The affected coating booth does not use an add-on control device to achieve compliance with a VOM emission limitation or standard.
 - ii. Potential pre-control emissions of PM/PM₁₀ from the affected coating booth are less than major source thresholds.

7.4.5 Control Requirements and Work Practices

- a. The Permittee shall operate and maintain the air pollution control devices, including monthly periodic inspection,

routine maintenance and prompt repairs of defects, if any, that assures compliance with conditions of this permit, including Condition 5.5. This condition is established pursuant to 39.5(7) of the Act.

- b. The Permittee should operate the affected coating booths in accordance with a manufacturer's manual, procedures and recommendations, or in accordance with the operational manuals/procedures established by the source. The Permittee should fulfill all steps prescribed there for the purposes of the monitoring of operating parameters and minimizing emissions released into the atmosphere. These written manuals/procedures should be kept at the source and be a part of the records established by this permit. This condition is established pursuant to 39.5(7) of the Act.

7.4.6 Production and Emission Limitations

Production and emission limitations are not set for the affected coating booths.

7.4.7 Testing Requirements

The Permittee should maintain annual certification on the VOM content (lb/gal or wt.%) for each solvent applied on the affected assembly stations. Such certification may be obtained by either testing of the solvents or by keeping the records of the manufacturer's specification sheets for each such solvent. This condition is established pursuant to 39.5(7) of the Act.

7.4.8 Monitoring Requirements

Specific monitoring requirements are not set for the affected coating booths.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating booths to demonstrate compliance with Condition 5.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Paint usage (gal/mo and gal/yr).
- b. Solvent usage (gal/mo and gal/yr).
- c. VOM content of each solvent and paint applied (wt.%).
- d. Density of solvent and paint (lb/gal).
- e. Hours of operations per month for each affected coating booth.

- f. Total emissions of VOM (monthly and annual) calculated based on the procedures established in Condition 7.4.12.
- g. Maintenance/repair log of inspections and the dates of the corrective actions taken.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating booths with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of any regulated air pollutants from the affected coating booths in excess of the limits specified in Condition 5.6 and Section 7.4 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected coating booths.

7.4.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.321 and 212.322 should be achieved by the proper operation and maintenance of the filters, as required by this section.
- b. Compliance with the opacity emission limits established by Condition 7.4.3(f) should be achieved by the proper operation, as required by Condition 7.4.5.
- c.
 - i. To determine compliance with Condition 5.6, VOM emissions from the affected spray booths shall be calculated based on the formula listed below:

$$\text{VOM Emissions(ton)} = \text{Gallons of Solvent/Paint Used (gal)} \times \text{Density (lb/gal)} \times \text{VOM Content of Solvent/Paint (wt.\%)} \times (1 \text{ ton}/2000 \text{ lb})$$
 - ii. Compliance with hourly VOM emission limit identified in Condition 7.4.3(c) for each affected coating booth should be demonstrated by dividing monthly VOM emissions by actual hours any particular coating booth was in operation in any given month.
- d. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.5 Curing Presses

7.5.1 Description

The source currently uses two basic types of curing machines to cure the tires manufactured by this plant. The first type of machines used at the source is referred to as a "press" and is used to cure the facility's smaller tires. These presses are each capable of curing one tire at a time. The second and largest type of curing machines at the source is capable of curing the facility's present full range of tire sizes. These tires can range from less than three feet to greater than 12 feet in diameter. These machines are referred to as "pot heaters" and are each capable of curing several tires at once. For purposes of the CAAPP permit, "curing press" is referenced to all types of curing machines. On all curing presses the tires are cured with a combination of hot water and steam.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Curing Presses	39 tire curing presses and pot heaters	1965-1975	None

7.5.3 Applicable Provisions and Regulations

- a. An "affected curing press" for the purpose of these unit specific conditions is a unit as described in Conditions 7.5.1 and 7.5.2 above.
- b. Each affected curing press (constructed after April 14, 1972) is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. Each affected curing press (constructed prior to April 14, 1972) is subject to 35 IAC 212.322(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or

modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].
- e. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.5.4 Non-Applicability of Regulations of Concern

The affected curing presses are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected curing presses do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.5.5 Control Requirements and Work Practices

The Permittee should operate the affected curing presses in accordance with a manufacturer's manual, procedures and recommendations, or in accordance with the operational manuals/procedures established by the source. The Permittee should fulfill all steps prescribed there for the purposes of the monitoring of operating parameters and minimizing emissions released into the atmosphere. These written manuals/procedures should be kept at the source and be a part of the records established by this permit. This condition is established pursuant to 39.5(7) of the Act.

7.5.6 Production and Emission Limitations

In addition to the source-wide emission limitations in Condition 5.6, the affected curing presses are subject to the following:

Emissions from the affected curing presses shall not exceed the following limits:

<u>Emission Units</u>	<u>Permit</u>	<u>VOM Emissions</u>	
		<u>(Lb/mo)</u>	<u>(T/yr)</u>
29 Tire Curing Presses or Pot Heaters	96060051, 98100016, 98010008, 99060090	2,500	13.3

The above limitations were established in the Permits mentioned above, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permits do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD. In addition, the above limitations contain revisions to these previously issued permits, as reflected in this Title V permit issued on August 6, 2001. Specifically, hourly emission rates have been replaced by monthly emission limits. In addition, the emission rate has been modified to be consistent with the most recent emission factors for tire curing [T1].

7.5.7 Testing Requirements

Testing requirements are not set for the affected curing presses.

7.5.8 Monitoring Requirements

Monitoring requirements are not set for the affected curing presses.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected curing ovens to demonstrate compliance with Conditions 5.6 and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of rubber processed for all affected presses and amounts of rubber processed for each individual press or group of presses, as established in condition 7.5.6(a).
- b. Average hourly production rate (rubber throughput) for each individual press (lb/hr) calculated each month.
- c. Average hourly VOM emissions for each individual press calculated each month based on the procedures established in Condition 7.5.12.
- d. Total emissions of VOM for all affected presses and VOM emissions for each individual press or group of presses, as established in condition 7.5.6(a), and calculated based on the procedures established in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating booth with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable

cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM from the affected curing process in excess of the limits specified in Conditions 7.5.3 and 7.5.6 within 30 days of such occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected curing presses.

7.5.12 Compliance Procedures

- a. Compliance with the opacity emission limits established by Condition 7.5.3(f) should be achieved by the proper operation, as required by Condition 7.5.5.
- b. Compliance with the PM emission limits established by 35 IAC 212.321 and 212.322 should be achieved by the proper operation, as required by Condition 7.5.5.
- c.
 - i. To determine compliance with Conditions 5.6 and 7.5.6, VOM emissions from the affected curing presses shall be calculated based on the emission factor equal to 0.000337 lb/VOM for each lb of rubber cured. This emission factor has been established in Table 4.12-11 of AP-42 and developed by the Rubber Manufacturing Association.
 - ii. To determine compliance with Condition 7.5.3(d), average hourly VOM emissions from each individual curing press shall be calculated by using the following equation and emission factor 0.000337 mentioned above:

$$\text{Hourly Emissions} = \text{Average hourly production rate} \\ (\text{lb}) \times 0.000337$$

- d. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.6 Solvent Storage Tank

7.6.1 Description

Solvents are stored at the 10,000 gallons storage tank.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Storage Tank	10,000 gallons storage tank equipped with submerged loading pipe	1988	None

7.6.3 Applicable Provisions and Regulations

- a. An "affected storage tank" for the purpose of these unit specific conditions is a unit as described in Conditions 7.6.1 and 7.6.2 above.
- b. The affected storage tank is subject to 35 IAC 215.122(b) and shall be equipped with a submerged loading pipe if the vapor pressure of volatile organic liquid exceeds 2.5 psia.

7.6.4 Non-Applicability of Regulations of Concern

- a. The affected storage tank is exempted from applicability of 35 IAC 215.121 because the capacity of this tank is less than 40,000 gallons.
- b. The affected storage tank is exempted from applicability of 40 CFR 60, Subpart Kb based on the design capacity of affected storage tank less than 40 cubic meters (10,576 gal).
- c. This permit is issued based on the affected storage tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected storage tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.6.5 Control Requirements and Work Practices

The Permittee should conduct annual inspections of conditions of the tank and the proper operation of a submerged loading pipe. This condition is established in accordance with provisions 39.5(7) of the Act.

7.6.6 Production and Emission Limitations

In addition to the source-wide emission limitations in Condition 5.6, the affected storage tank is subject to the following:

Emissions and operations of the affected storage tank shall not exceed the following limits:

<u>Solvent Throughput</u> <u>(gal/yr)</u>	<u>(T/mo)</u>	<u>VOM Emissions</u> <u>(T/yr)</u>
250,000	0.22	1.069

- a. These limits are based on the maximum design capacity of affected storage tank and the maximum vapor pressure of solvents stored equal to 2.25 psia [T1].
- b. The above limitations were established in the Permit 96060051, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD. In addition, the above limitations contain revisions to these previously issued permits, as reflected in this Title V permit issued on August 6, 2001. Specifically, monthly and annual solvent usage limits have been established without any increase of annual VOM emission level [T1].
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.6.7 Testing Requirements

Testing requirements are not set for the affected storage tank.

7.6.8 Monitoring Requirements

Work practice requirements of Condition 7.6.5 serve for the non-instrumental monitoring requirement of this subsection.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected storage tank to demonstrate compliance with Conditions 5.6 and 7.6.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly and annual solvent throughput (gallons/month and gallons/year).
- b. Monthly and annual VOM emissions calculated based on the compliance procedure in Condition 7.6.12.
- c. Maintenance/repair log of inspections and the dates of the corrective actions taken.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Storage tank solvent throughput and emissions of VOM in excess of the limits specified in Condition 7.6.6 within 30 days of such occurrence.
- b. Malfunction of the submerged loading pipe within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected storage tank.

7.6.12 Compliance Procedures

- a. To determine compliance with Conditions 5.6 and 7.6.6, VOM emissions from the affected storage tank shall be calculated based in the current version of the TANK program.
- b. Compliance with Condition 7.6.3 shall be achieved by annual inspection and recordkeeping requirements established by Condition 7.6.5.
- c. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7 Fuel Combustion Emission Units

7.7.1 Description

Natural gas and waste oil fired boilers are used to produce heat and steam at the source. Natural gas-fired heaters are used for comfort heating purposes.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Fuel Combustion	Steam Boilers Three natural gas-fired boilers with a capability of combusting waste oils. Two boilers are rated at 32.2 mmBtu/hr each and one is rated 35.0 mmBtu/hr	N/A	None
	Natural Gas-Fired Heaters Heaters are rated at 2.5 mmBtu/hr each (9 units) and 11.0 mmBtu/hr (1 unit)	1965	None

7.7.3 Applicable Provisions and Regulations

- a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions is emission units described in Conditions 7.7.1 and 7.7.2 above.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].
- c. Steam boilers are also subject to the following:
 - i. The emissions of particulate matter into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion unit using liquid fuel exclusively [35 IAC 212.206].
 - ii. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one-hour period from any existing fuel combustion emission source, burning liquid fuel exclusively:

- A. To exceed 1.55 kg of sulfur dioxide per MW-hr of actual heat input when residual fuel oil is burned (1.0 lb/mmBtu);
 - B. To exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [35 IAC 214.161].
- d. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.7.4 Non-Applicability of Regulations of Concern

- a. Each affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 215.303, any fuel combustion emission unit is not subject to 35 IAC Part 215, Subpart G: Use of Organic Material.
- c. This permit is issued based on the affected fuel combustion emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected fuel combustion emission units do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.7.5 Control Requirements and Work Practices

- a. Each affected fuel combustion emission unit (except the steam boilers) shall only be operated with natural gas as the fuel.
- b. The steam boilers are allowed to burn waste oil generated on site. The waste oil is limited to the following constituents:
 - i. Hydraulic Oil
 - ii. Lubricating Oil
 - iii. Engine Oil
- c. The combustion of waste oil may not be initiated during periods of start-up, malfunction, or breakdown. The firing

of waste oil shall be discontinued until the malfunction or breakdown is corrected.

- d. The Permittee is prohibited from mixing hazardous wastes with the waste oils. Waste oils containing more than 1000 ppm of total halogens is presumed to be a hazardous waste, as per 35 IAC 726.140(c). The Permittee is prohibited from burning such waste oils without an approval of the Illinois EPA.
- e. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7.6 Production and Emission Limitations

In addition to the source-wide emission limitations in Condition 5.6, the affected fuel combustion emission units are subject to the following:

a. Natural Gas Mode

- i. Total natural gas consumption shall not exceed 96 mmscf/month and 1,143 mmscf/year.
- ii. Total emissions shall not exceed the following limits:

<u>Pollutant</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
NO _x	4.8	57.15
CO	4.03	48.0
PM	0.36	4.34
VOM	0.26	3.14

b. Waste Oil Mode (steam boilers only)

Total waste fuel oil usage shall not exceed 320 gal/month and 3,200 gal/year [T1].

- c. These limits are based on the maximum operating rate and standard emission factors established in AP-42 [T1].
- d. The above limitations were established in the Permit 73010510, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD. In addition, the above limitations contain revisions to these previously issued permits, as reflected in this Title V permit issued on August 6, 2001. Specifically, emissions of natural gas consumption have been lowered, as a reflection of current standard emission factors, and production limitations have been established for waste oil consumption [T1].

- e. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.7.7 Testing Requirements

- a. The Permittee shall analyze on a quarterly basis, a representative sample of the waste oil to be burned, for flash point, BTU content, density, total halogens, arsenic, cadmium, lead, and sulfur. The quantities and analyses of the waste oil shall be reported to the Illinois EPA within 30 days following the year that the oil was burned.
- b. The Permittee shall use USEPA Method 5 for testing PM emissions once every five years while burning waste oil.
- c. The Permittee shall use USEPA Method 9 for testing opacity once a year while burning waste oil.
- d. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7.8 Monitoring Requirements

- a. Testing requirements described in Condition 7.7.7(a) should be used as a surrogate for the monitoring of composition, characteristics and parameters of the waste oils being burned in the steam boilers as a fuel.
- b. CO combustion analysis should be prepared on the annual basis if the waste oils had been burned for the reported period.
- c. Testing requirements described in Condition 7.7.7(b) and (c) should be used for the purposes of monitoring the operations of the steam boilers during the time when waste oil is used as a fuel.
- d. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected fuel combustion emission units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas consumption (mmscf/month or therms/month and mmscf/yr or therms/yr) for all affected fuel combustion emission units.

- b. Total waste oil consumption (gal/month and gal/year).
- c. CO combustion analysis results.
- d. Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.7.12.
- e. Records of the test and analysis results required by Condition 7.7.7.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected fuel combustion emission units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Production and emission limits for the affected fuel combustion emission units in excess of the limits specified in Condition 7.7.6 and 7.7.3 within 30 days of such occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected fuel combustion emission units.

7.7.12 Compliance Procedures

- a. Compliance with limitation of Condition 7.7.3(c)(i) shall be achieved by the testing requirements of Condition 7.7.7(b) and the recordkeeping requirements of Condition 7.7.12.
- b. Compliance with limitation of Condition 7.7.3(d) shall be achieved by the testing requirements of Condition 7.7.7(c) and the recordkeeping requirements of Condition 7.7.12.
- c. Compliance with limitation of Condition 7.7.3(b) shall be achieved by the monitoring requirements of Condition 7.7.8(b) and the recordkeeping requirements of Condition 7.7.12.
- d. Compliance with the emission limits in Conditions 5.6 and 7.7.6 is addressed by the records required in Condition 7.7.9 and the emission factors and formulas listed below:

i. Natural Gas Mode

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
PM	7.6
NO _x	100.0
CO	84
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

Emissions(lb) = natural gas consumed multiplied by the appropriate emission factor.

ii. Waste Oil Mode

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10³ gal)</u>
NO _x	19
SO ₂	4.9
CO	5

These are the emission factors provided by the Permittee.

Emissions (lb) = Waste oil consumed multiplied by the appropriate emission factor.

- e. All conditions described above are established in accordance with provisions 39.5(7) of the Act.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after June 22, 2006, unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of

such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	July 31
July - December	January 31

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7) (a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7) (e) (i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5) (e) and (i) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5) (l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5) (h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

10.1.1.1 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.1.2 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Attachment 3 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

AB:psj